

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

Southwest Regional Office
318 Park Central East, Suite 500
Springfield, MO 65806

Christian County/HZW
Wilcorp Industries Inc. 417/895-6950 FAX 417/895-6954

LOW 91-SW.031

Certified Mail
P 332 297 147

November 20, 1991

Mr. Randy VanLanduyt
Plant Manager
Wilcorp Industries Inc.
P.O. Box 201
Billings, MO 65610

Dear Mr. VanLanduyt:

Please find enclosed a copy of the hazardous waste compliance inspection report for the Wilcorp Industries Inc. facility at Billings in Christian County, Missouri. The report is believed to be self-explanatory.

This office has received and reviewed the November 8, 1991, response to Notice of Violation (NOV) number 2133 issued to the Wilcorp Industries Inc. November 4, 1991. The response addressed the class I violations regarding the open containers of hazardous waste in satellite accumulation, and in storage accumulation.

The response also indicated that Wilcorp Industries has met with employees to review the regulations concerning proper labelling and marking requirements and that a list of job titles and job descriptions is being developed for use in personnel training records. In addition, Wilcorp indicated that the hazardous waste storage area had been rearranged to allow access to all drums of waste.

This letter will require additional information regarding the violations listed on the NOV and other violations observed at the facility but not listed on the November 4, 1991 NOV.

RECEIVED
91 NOV 26 AM 9 48
HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES



R00073256
RCRA Records Center



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To demonstrate compliance with the Missouri Hazardous Waste Management Law and Regulations, Wilcorp Industries Inc. must submit the following documentation by December 24, 1991:

1. Photographic evidence that all containers of waste in the storage area are properly closed and certification that they will be kept closed except when adding or removing waste.
2. Photographic evidence that the hazardous waste storage area has been rearranged to allow access to all containers of waste and certification that adequate aisle space will be maintained in the future.
3. Photographic evidence that all containers in satellite accumulation are properly closed and certification that they will be kept closed except when adding or removing waste.
4. Photographic evidence indicating that the correct beginning accumulation date has been included on the drums of waste in satellite accumulation and certification that this date will be correctly used in the future.
5. Photocopies of the section of the personnel training records indicating that the job titles and job descriptions of employees whose jobs relate to hazardous waste have been included.
6. Photocopies of the page of the contingency plan indicating that the home addresses of the emergency coordinators have been included.
7. Certification that the correct Missouri manifest document number will be included on all future manifests.

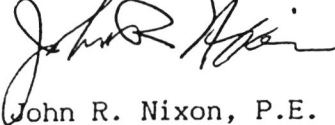
The aforementioned documentation must be submitted to this office with a copy sent to Mr. Bruce Martin, Department of Natural Resources, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

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If you have any questions regarding this matter, please contact
Mark Rader of this office.

Sincerely,

SOUTHWEST REGIONAL OFFICE



John R. Nixon, P.E.
Regional Director

JRN/mr

enc.

cc: Mr. Bruce Martin, WMP

RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT
NOVEMBER 20, 1991

Facility

Wilcorp Industries
P.O. Box 201
Billings, MO 65610
(417) 744-4132

EPA ID: MOD981496870
MO Generator ID:04787

Participants

Department of Natural Resources

Mr. Mark Rader
Environmental Specialist
Southwest Regional Office

Mr. Charles L. Kroeger
Environmental Specialist
Southwest Regional Office

Wilcorp Industries

Ms. Charlotte Maples
Administrative Assistant

Ms. Cindy Hager
Samples and Supply

INTRODUCTION

On November 4, 1991, a Resource Conservation and Recovery Act (RCRA) Hazardous Waste Management Compliance Inspection was conducted at the Wilcorp Industries facility in Billings, Missouri. The inspection was conducted by Mark Rader and Charles L. Kroeger of the Missouri Department of Natural Resources under the authority of the Missouri Hazardous Waste Management Law, Sections 260.375(9) and 260.377 RSMo.

During the opening conference of the inspection the purpose of the inspection was explained to Mss. Maples and Hager. The related paperwork was reviewed and discussed and the facility representatives led the inspectors on a tour of the facility to examine the areas of hazardous waste generation.

Following the facility tour the inspectors met with Ms. Maples to discuss violations noted during the inspection. Notice of Violation (NOV) number 2133 was issued for the failure to keep containers of waste closed in storage, failure to maintain adequate aisle space, failure to keep the container of waste in satellite accumulation closed, failure to mark the container in accumulation identifying contents and beginning date of accumulation and for failure to list job titles and job descriptions with personnel training records.

The procedure for responding to the NOV was explained and Ms. Maples was informed that upon receipt of the response to the NOV a full inspection report detailing the inspection and all violations would be submitted.

Wilcorp Industries responded to NOV number 2133 on November 8, 1991 and addressed the following items: all containers will be kept closed at all times and will be appropriately marked identifying the beginning date of accumulation, the storage area has been rearranged allowing access to all containers in storage and a list of job titles with job descriptions is being developed for use at the facility.

FACILITY DESCRIPTION

Wilcorp Industries is registered with the department as a large quantity generator of hazardous wastes generated from the activities involved in repackaging adhesives. Wilcorp's quarterly summary reports identify six waste streams being generated: a mixture of adhesives and 1-1-1 Trichloroethane (F002); a mixture of Methyl Ethyl Ketone, Toluene and adhesives (F005/D001); waste containers of hexane propane spray adhesives (D001); the lead peroxide polysulfide oxidizer (D001); the Safety Kleen corrosive cleaning liquid (F002); and the waste petroleum combustible liquid from Safety Kleen (D001).

The processes involve the receipt of adhesives in five to 55 gallon containers and, through the use of pumps and gravity, repackaging the adhesive into pint, quart and gallon containers. Waste 1-1-1 Trichloroethane solvent is generated intermittently during parts cleaning and no 1-1-1 Trichloroethane was in storage at the time of inspection. A mixture of MEK and Toluene is generated from the process of discarding excess amounts of the solvent based adhesives. This waste is allowed to drain inverted into a drum containing pumpable liquid waste. The containers which have been emptied are then stored in another drum which also contains rags and other contaminated solids for disposal.

The lead peroxide polysulfide oxidizer (D001) is generated in the hand pack area. This waste is mainly a solid and is made up of disposable rubber gloves and sticks used to fill the smaller containers. This waste is accumulated in a satellite area until moved into storage. The hexane propane spray adhesive containers (D001) are accumulated in the storage area. This waste consists of empty aerosol containers which are used to apply the labels to the newly filled containers of adhesive and are treated as hazardous when empty.

The facility utilizes a Safety Kleen parts washer using a petroleum naptha and a corrosive parts cleaning unit for use in the maintenance area. This waste is disposed of by Safety Kleen.

Epoxy resins generated at the facility are stored with the hazardous waste and manifested off site, however this waste is not considered hazardous.

At the time of inspection there were 23 drums of waste in storage. Wilcorp representatives felt that two of the drums contained the waste epoxy resins. Five of these drums were considered open containers by the inspectors. One drum of pumpable liquid (MEK/Toluene) was in storage with a funnel in the bung, this funnel was covered but not securely closed. One drum of the hexane propane canisters was open in accumulation. Three drums of the solid MEK/Toluene waste were open in accumulation.

The drums were stored on pallets in double rows stacked two high along the wall. Due to this it was not possible to examine all containers of waste. Since the storage area was located in a flammable area Wilcorp requested that the department not take photographs due to the possibility of the flash causing explosion.

Wilcorp Industries employs approximately 40 people and has been at the same location for approximately five years.

UNSATISFACTORY FEATURES AND RECOMMENDATIONS

The 40 CFR regulations cited have been adopted by reference in the Missouri Hazardous Waste Management Law.

1. Failure to keep containers of hazardous waste closed during storage; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a). There were five drums of hazardous waste in the storage area which were open during accumulation. One drum of waste hexane propane canisters, one drum of waste liquid MEK/Toluene flammable liquid and three drums of the waste MEK/Toluene solid material were considered open containers. The drum of liquid waste will need to be kept closed at all times except when adding or removing waste by either keeping the bung securely in place or developing a funnel which can be securely closed. The drums of solid material also need to be kept closed, however, the closure on these drums does not need to be as secure as the closures on the drums of liquids. Wilcorp may be able to develop a tarp-like closure which can be secured to the drum and still allow relatively easy access. Wilcorp's response of November 8 indicated that these containers will be kept closed at all times.

2. Failure of a generator of greater than 1000 kg/mo to provide adequate aisle space; 10 CSR 25-5.262(1) referencing 40 CFR 262.34(a)(4), further referencing 40 CFR 265.35. It was noted that the aisle space in the storage area was inadequate. The hazardous wastes should be stored such that there is adequate aisle space to allow the unobstructed movement of personnel and emergency equipment in and around the containers. Wilcorp's response of November 8 indicates that the storage area has been rearranged to allow access to all containers of hazardous waste.
3. Failure to keep containers of hazardous waste closed during accumulation in the satellite accumulation area; 10 CSR 25-5.262(1) referencing 40 CFR 262.34(c)(1)(i), further referencing 40 CFR 265.173.(a). The drum of waste lead peroxide polysulfide oxidizer was not considered a closed container. The ring top drum lid was placed on the drum, but was not tightened. Under department policy this does not constitute a closed container. Wilcorp will need to develop a closure for the drum to ensure that if the drum were to tip over the contents would not be released. The November 8 response indicates that this will be addressed.
4. Failure to provide the beginning date of accumulation on the containers of hazardous waste: 10 CSR 25-5.262(1) referencing 40 CFR 262.34(a)(2). The date of accumulation must be provided on all containers of hazardous waste during the entire on-site storage period. Wilcorp's November 8 response indicates all containers of hazardous waste will be appropriately labeled in the future.
5. Failure of a generator of more than 1000 kg to provide the job title and job description for the persons involved in hazardous waste training; 40 CFR 262.34(a)(4) further referenced to 40 CFR 265.16(d). In addition to the names of the employees who received hazardous waste training, the records must include the job titles and job descriptions for each of those employees. The records should demonstrate that training has been given to all employees whose positions are related to hazardous waste or who might respond to hazardous waste emergency incidents. Wilcorp's November 8 response indicates a listing identifying these features is being drawn up for use at the facility.
6. Failure of a large quantity generator to provide the home addresses of the emergency coordinators in the contingency plan; 40 CFR 262.34(a)(4) cross-referenced to 265.52(d). The home addresses of the emergency coordinators were not provided in the facility's contingency plan. It is recommended that if the addresses include a route and box number, directions to the residence be provided.

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7. Failure to provide the Missouri Manifest Document Number on all manifests; 10 CSR 25-5.262(2)(B)2.A. The Missouri Hazardous Waste regulations require that the Missouri Manifest Document Number be provided on all manifests. The number consists of the five (5) digit Missouri generator identification number and the consecutive shipment number. The number can be provided in the Additional Information area of manifests from other states. Wilcorp utilizes both Safety Kleen and Chemolite to transport waste from the facility. On several of the manifests the Missouri Manifest Document Number was identical, Wilcorp should notify Safety Kleen of their need to have a unique number for each manifest and request that Wilcorp's number be inserted into this space. If this is not feasible, Wilcorp should place their unique number in the additional information area of the manifest.


ADDITIONAL COMMENTS AND RECOMMENDATIONS

During the inspection it was noted that Wilcorp had a new maintenance person who had yet to receive training, it was erroneously stated that Wilcorp had three months to conduct this training. Regulations state that the facility has six months from the time of hiring or movement to a new position to conduct this training, however, the personnel must not work unsupervised until that training is complete.

Submitted By:

Approved By:


Mark Rader
Environmental Specialist
SOUTHWEST REGIONAL OFFICE


Charles L. Kroeger
Unit Chief
SOUTHWEST REGIONAL OFFICE



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
LARGE QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

L
LOG-INSP.

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <i>Wil Corp Industries</i>		DATE <i>Nov 4 91</i>	EPA I.D. NUMBER <i>MO17 981496870</i>
ADDRESS <i>P.O. Box 201</i>		RR NO.	MO I.D. NUMBER <i>04787</i>
CITY <i>Billings</i>	NUMBER OF EMPLOYEES <i>40</i>	YEARS AT SITE <i>5 1/2</i>	TELEPHONE NUMBER
FACILITY REPRESENTATIVE(S), TITLE(S) <i>Cynthia Hager Samples + Supplies Charlotte Marks Admin Asst</i>			

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.

*MUST WASTE SOILED RAGS LEFTOVER MATERIAL
ADHESIVES SOLVENT BASED
X MEK pure cleaning parts
X Toluene largest % of waste
X 111 Tric very small amount
X Hexane Propane - cans from use in packaging
repackage adhesives for 3M
also ingredients in glue
X Oxidizer lead peroxide*

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1. <i>MEK</i>		<i>FOUR DO35</i>	
2. <i>Trichlore</i>			
3. <i>Hexane Propane Super 77 spray adhesive</i>		<i>D001</i>	
4. <i>Oxidizer lead peroxide</i>		<i>D001</i>	
5.			

CHECK ALL THAT APPLY (Specify if possible)

<input type="checkbox"/> NPDES Permit	<input type="checkbox"/> Lead/Acid Batteries	<input type="checkbox"/> POTW _____
<input type="checkbox"/> Septic Tank	<input type="checkbox"/> H.W. Burner/Blender/Marketer	<input type="checkbox"/> Solid Waste Landfill _____
<input type="checkbox"/> Air Permit	<input type="checkbox"/> Precious Metal Reclamation	<input type="checkbox"/> Waste Water Pretreatment _____

A. GENERAL

1. ☒ Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)
2. ☒ Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11
3. ☒ Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo
4. ☒ Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo
5. ☒ Facility does not operate as a TSD - Section 260.390(1) RSMo

COMMENTS**PART 1: WALK-THROUGH INSPECTION****B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

1. ☒ Storage does not exceed 90 days or 180/270 days if facility generates <1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)
2. ☒ Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171
3. ☒ Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172
4. ☒ Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)
5. ☒ Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c)
6. ☒ Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262 (2)(C)2.B.(I)
7. ☒ Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262 (2)(C)2.B.(III)(a).
8. ☒ Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(III)(b).
9. ☒ Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.B.(III)(c).
10. ☒ Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.B.(III)(d).
11. ☒ Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.B.(III)(e).
12. ☒ Containers of ignitable or reactive waste stored >50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7.and 8.
13. ☒ Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)
14. ☒ Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.
15. ☒ Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)
16. ☒ Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II) referencing 40 CFR 265.174
17. ☒ Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)
18. ☒ Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35
19. ☒ Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33
20. ☒ "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)
21. ☒ Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)

COMMENTS

only one drum figured

small could see

work in area daily

stacked 2 ↑ on wall 2 deep

Building

C. SATELLITE ACCUMULATION

1. ☒ Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a)

COMMENTS

sat spots visible from SD (cls)

2. ☒ Containers in good condition - SR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171
3. ☒ Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172
4. ☒ Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)
5. ☒ Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).
6. ☐ Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.
7. ☒ Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.

COMMENTS

Set out area of Ordina

3 Solid wastes cur space

no begin date

Why it added consistently

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. ☒ Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31
2. ☒ Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) - 10 CSR 25-5.262 (2)(C)2.E.
3. ☒ Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d)
4. ☒ Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a)
5. ☒ Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b)
6. ☒ Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33

COMMENTS

Shovel, scraper, sorbents splash suits in locker room

work safety in area

inspected

E. LQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.				
3.				
4.				
5.				

1. ☒ Spill prevention controls in place and operating e.g. check valves, dry discount couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1)
2. ☐ Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2)
3. ☐ Sufficient freeboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3)
4. ☐ Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a)
5. ☐ Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a)
6. ☐ Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2)
7. ☐ Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b)

COMMENTS

8.	<input checked="" type="checkbox"/>	Volatiles with vapor pressure _____ mm @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(I)
9.	<input checked="" type="checkbox"/>	Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a)
10.	<input checked="" type="checkbox"/>	Secondary containment system provided for tanks and equipment; installed after July 14, 1986; storing dioxin waste; over 15 years old; of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)
11.	<input type="checkbox"/>	Secondary containment system constructed of or lined with impervious waste compatible material - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1)
12.	<input type="checkbox"/>	Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2)
13.	<input type="checkbox"/>	Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3)
14.	<input type="checkbox"/>	Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(b)
15.	<input type="checkbox"/>	Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(c)
16.	<input type="checkbox"/>	Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(a)
17.	<input type="checkbox"/>	Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(d)
18.	<input type="checkbox"/>	Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4)
19.	<input type="checkbox"/>	Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)
20.	<input type="checkbox"/>	Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a)
21.	<input type="checkbox"/>	Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c)
22.	<input type="checkbox"/>	Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b)
23.	<input type="checkbox"/>	Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.192
24.	<input type="checkbox"/>	Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191
25.	<input type="checkbox"/>	Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i)
26.	<input type="checkbox"/>	Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196

COMMENTS

PART 2: RECORDS INSPECTION

F. MANIFESTS

1. ☒ Facility uses manifest system - 260.380.1.(6) RSMo, and 10 CSR 25-5.262(2)(B)
2. ☒ Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)
3. ☒ Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)
4. ☒ Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.
5. ☒ Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)2.
6. ☒ All transporters' names, phone numbers, MO & EPA I.D.#'s, license plate # - 10 CSR 25-5.262(2)(B)2.
7. ☒ Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)2.
8. ☒ DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.
9. ☒ Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.
10. ☒ Manifest signed and dated - 10 CSR 25-5.262(2)(B)2.
11. ☒ Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.
12. ☒ Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.
13. ☒ Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C.
14. ☒ Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1.

COMMENTS

SK & Chemolite Man doc
& consecutive ship #s
overlap

G. LAND DISPOSAL RESTRICTIONS

1. ☒ Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
2. ☒ Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a)
3. ☒ "Land-Ban" notification/certification, sent with manifests and retained on-site for five years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
4. ☒ Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)
5. ☒ Waste analysis plan on-site and utilized if generator treats hazardous waste in tanks or containers to meet LDR treatment standards - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(4)

COMMENTS

H. PERSONNEL TRAINING

1. ☒ Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).
2. ☒ Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b)
3. ☒ Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c)
4. ☒ Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2)
5. ☒ Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)

COMMENTS

Training in
Hazcom includes responding to
spills emergencies, etc

New employee 3 months
not yet trained < 6 months

Just recently became LDR

Haz Waste management
Under RCRA Seminar

List up what training entails
no sign ups etc

6. <input checked="" type="checkbox"/> Gives job title, job description name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2)	ONLY EMPLOYEES WHO HANDLE RECEIVED Sign up sheet Review of Emergency Procedures & Hazard Com Program
7. <input checked="" type="checkbox"/> Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3)	
8. <input checked="" type="checkbox"/> Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4)	
9. <input checked="" type="checkbox"/> Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e)	

I. CONTINGENCY PLAN

1. <input checked="" type="checkbox"/> Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).	COMMENTS Fire Dept Police Cox Hos ONLY HOME PHONE NUMBERS Emergency Coordinators
2. <input checked="" type="checkbox"/> Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b)	
3. <input checked="" type="checkbox"/> Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55	
4. <input checked="" type="checkbox"/> Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a)	
5. <input checked="" type="checkbox"/> Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c)	
6. <input checked="" type="checkbox"/> Lists names, addresses and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	
7. <input checked="" type="checkbox"/> Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	
8. <input checked="" type="checkbox"/> List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e)	
9. <input checked="" type="checkbox"/> Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f)	

J. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D).	COMMENTS
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.	
3. <input checked="" type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	

K. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	COMMENTS
2. <input checked="" type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3)(E)3.	
3. <input checked="" type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1. and 2.	
4. <input checked="" type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	
5. <input checked="" type="checkbox"/> Facility maintains a written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.	

6. <input checked="" type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1.	COMMENTS
7. <input checked="" type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2.	
8. <input checked="" type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3.	
9. <input checked="" type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4.	

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS

open containers in ~~the~~ accumulation
in Storage area 4 open drums of
solids - 1 open drum of liquid

INSPECTOR'S SIGNATURE

DATE

oxidizer poly sulfate
hand pack area
use scoop to remove from
bucket into jars
waste to solids gloves sticks

Storage area

23 drums 2 epoxy resin

1 can spray cans open

3 MEKT solids open

1 drum MEKT liquid open w/ bucket covered

2 days to fill

usually only one drum of liquid
maybe two — no contaminants

5K corrosives & parts washer